# UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION 14

CONSOLIDATED COMMUNICATIONS D/B/A	)		
ILLINOIS CONSOLIDATED TELEPHONE	)		
COMPANY,	)		
	)		
and	)	Cases	14-CA-094626
	)	and	14-CA-101495
LOCAL 702, INTERNATIONAL	)		
BROTHERHOOD OF ELECTRICAL	)		
WORKERS, AFL-CIO,	)		
	)		
	)		

## RESPONDENT'S MOTION TO EXCEED PAGE LIMITATIONS

Pursuant to Section 102.46(j) of the Rules and Regulations, Respondent respectfully moves for an order from the Board permitting it to file a brief in support of its exceptions to the ALJ's decision and the proceedings that exceeds 50 pages. In support thereof, Respondent offers the following:

- 1. Respondent's exceptions to the Board are currently due on January 10, 2014.
- 2. The case implicates numerous disputes, generating over 1,350 pages in transcript following the testimony of 20 witnesses.
- 3. Respondent respectfully takes issue with many of the ALJ's factual findings and legal conclusions and anticipates filing approximately 150 to 200 exceptions, along with a detailed brief in support of its exceptions.
- 4. While Respondent does not intend to overburden the Board, it believes it may not be able to summarize the evidence and advance all of its arguments effectively within 50 pages. Respondent notes that its brief and the Charging Party's brief to the ALJ following the hearing both exceeded 50 pages.

# Respectfully submitted this 6th day of December, 2013.

#### **HUNTON & WILLIAMS LLP**

## /s/ Robert T. Dumbacher

David C. Lonergan Fountain Place, Suite 3700 1445 Ross Avenue Dallas, Texas 75202-2799 Telephone: 214-979-3000

Email: dlonergan@hunton.com

Robert T. Dumbacher Bank of America Plaza 600 Peachtree Street, N.E., Suite 4100 Atlanta, Georgia 30308-2216 Telephone: 404-888-4000

Email: rdumbacher@hunton.com

Attorneys for Respondent Consolidated Communications d/b/a Illinois Consolidated Telephone Company

#### **CERTIFICATE OF SERVICE**

I certify that on this 6th day of December, 2013, I caused the foregoing to be electronically filed the with the National Labor Relations Board at http://nlrb.gov and a copy of same to be served via electronic mail to the following:

Paula B. Givens
National Labor Relations Board
1222 Spruce St., Room 8.302
St. Louis, MO
Paula.Givens@nlrb.gov

Brad Beisner Local 702 IBEW 106 N. Monroe Street West Frankfort, IL 62896-2414 bbeisner@ibew702.org Christopher N. Grant, Attorney Schuchat, Cook & Werner 1221 Locust Street, Suite 250 Saint Louis, MO 63103-2364 cng@schuchatcw.com

s/Robert T. Dumbacher
Robert T. Dumbacher